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October 3, 2023

VIA ECF

Honorable Taryn A. Merkl
United States Magistrate Judge
United States District Court,
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Bartlett, et al. v. Société Générale de Banque au Liban S.A.L., et al.,*
Case No. 19-cv-007 (CBA) (TAM)**

Dear Judge Merkl:

We write on behalf of Moving Defendants¹ pursuant to the Court's order dated August 14, 2023, directing them to effectuate delivery of the Letters Rogatory as soon as practicable and to submit a status report by October 13, 2023 in connection therewith. (ECF 342).

Pursuant to the Court's order, DLA Piper undertook to effect delivery and service of the Letters Rogatory on behalf of all Moving Defendants. The Government of Lebanon requires that the Letters Rogatory be formally served through official channels. Because Lebanon is not a signatory to the Hague Convention on Service Abroad, service must be effectuated through the Office of International Judicial Assistance of the U.S. Department of State. Upon completion of the legalization process required by the State Department for service of Letters Rogatory abroad,² we delivered certified and authenticated copies of the Letters Rogatory, including the exhibits thereto and translations thereof into Arabic, to the State Department's Office of International Judicial

¹ The Moving Defendants (also referred to herein as the "Banks") are (1) Société Générale de Banque au Liban S.A.L., (2) Fransabank S.A.L., (3) MEAB Bank s.a.l., (4) BLOM Bank S.A.L., (5) Byblos Bank S.A.L., (6) Bank Audi S.A.L., (7) Bank of Beirut S.A.L., (8) LGB Bank s.a.l., (9) Banque Libano Française S.A.L., (10) Bank of Beirut and the Arab Countries S.A.L., and (11) Fenicia Bank S.A.L.

² See, e.g., "Preparation of Letters Rogatory," U.S. Department of State – Bureau of Consular Affairs, <https://travel.state.gov/content/travel/en/legal/travel-legal-considerations/international-judicial-assistance/obtaining-evidence/Preparation-Letters-Rogatory.html> (last accessed on October 3, 2023), and "Authentication Certificate Requirements," U.S. Department of State – Bureau of Consular Affairs, <https://travel.state.gov/content/travel/en/records-and-authentications/authenticate-your-document/authentication-certificate-requirements.html> (last accessed on October 3, 2023).



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Assistance on October 3, 2023. Given the indeterminate time it takes to complete formal service through diplomatic channels, we also informally delivered the Letters Rogatory and exhibits to the Secretary General of the Special Investigation Commission of the Central Bank of Lebanon³ on September 7, 2023, and informed the Secretary General that the Court requested the Lebanese Government respond to its request for assistance on or before April 14, 2024 (eight months from the date of issuance of the Letters Rogatory by the Court).

We will report on any further developments regarding the service of the Letters Rogatory in the subsequent status reports that the Court has ordered be filed every 90 days following the submission of this first report.

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Jonathan D. Siegfried

Jonathan D. Siegfried

cc: All counsel of record via ECF

³ The Special Investigation Commission of the Central Bank of Lebanon is the financial intelligence unit within the Lebanese Government which, *inter alia*, coordinates with foreign and local authorities on requests for assistance to lift bank secrecy.